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*Attorneys for Plaintiff  
Christine DiBella  
and the Proposed Classes*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY,  
STEVE RELYEA, Acting Chancellor of  
California State University, in his official  
capacity; JOLENE KOESTER, incoming  
Interim Chancellor of California State  
University, in her official capacity;  
JEFFREY D. ARMSTRONG, President of  
California Polytechnic State University,  
San Luis Obispo, in his official capacity;  
ERIKA D. BECK, President of California  
State University, Northridge, in her official  
capacity; SORAYA M. COLEY, President  
of California Polytechnic State University,  
Pomona, in her official capacity; JANE

CASE NO. 3:21-cv-08461-TLT  
Civil Rights

**STIPULATION AND [PROPOSED] ORDER  
OF DISMISSAL WITH PREJUDICE**

1 CLOSE CONOLEY, President of  
 2 California State University, Long Beach, in  
 3 her official capacity; WILLIAM A.  
 4 COVINO, President of California State  
 5 University, Los Angeles, in his official  
 6 capacity; THOMAS A. CROPPER,  
 7 President of California State University  
 8 Maritime Academy, in his official capacity;  
 9 ADELA DE LA TORRE, President of San  
 10 Diego State University, in her official  
 11 capacity; GAYLE E. HUTCHINSON,  
 12 President of California State University,  
 13 Chico, in her official capacity; TOM  
 14 JACKSON, JR., President of California  
 15 Polytechnic State University, Humboldt, in  
 16 his official capacity; SAÚL JIMÉNEZ-  
 17 SANDOVAL, President of California State  
 18 University, Fresno, in his official capacity;  
 19 ELLEN N. JUNN, President of California  
 20 State University, Stanislaus, in her official  
 21 capacity; LYNN MAHONEY, President of  
 22 San Francisco State University, in her  
 23 official capacity; TOMÁS D. MORALES,  
 24 President of California State University,  
 25 San Bernardino, in his official capacity;  
 26 ROBERT S. NELSEN, President of  
 27 California State University, Sacramento, in  
 28 his official capacity; ELLEN J.  
 NEUFELDT, President of California State  
 University, San Marcos, in her official  
 capacity; EDUARDO M. OCHOA,  
 President of California State University,  
 Monterey Bay, in his official capacity;  
 THOMAS A. PARHAM, President of  
 California State University, Dominguez  
 Hills, in his official capacity; STEPHEN  
 PEREZ, President of San Jose State  
 University, in his official capacity; JUDY  
 K. SAKAKI, President of Sonoma State  
 University, in her official capacity;  
 CATHY A. SANDEEN, President of  
 California State University, East Bay, in  
 her official capacity; FRAMROZE  
 VIRJEE, President of California State  
 University, Fullerton, in his official  
 capacity; RICHARD YAO, President of  
 California State University, Channel  
 Islands, in his official capacity;

LYNNETTE ZELEZNY, President of  
California State University, Bakersfield, in  
her official capacity; COMPASS GROUP  
USA, INC. dba CHARTWELLS HIGHER  
EDUCATION,

Defendants.

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BOARD OF TRUSTEES OF THE CALIFORNIA  
STATE UNIVERSITY and individual defendants  
(see complete list of individual defendants on signature page)

**STIPULATION**

Plaintiff CHRISTINE DIBELLA and Defendants BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY, STEVE RELYEA, Acting Chancellor of California State  
University, in his official capacity; JOLENE KOESTER, incoming Interim Chancellor of  
California State University, in her official capacity; JEFFREY D. ARMSTRONG, President of  
California Polytechnic State University, San Luis Obispo, in his official capacity; ERIKA D.  
BECK, President of California State University, Northridge, in her official capacity; SORAYA  
M. COLEY, President of California Polytechnic State University, Pomona, in her official  
capacity; JANE CLOSE CONOLEY, President of California State University, Long Beach, in  
her official capacity; WILLIAM A. COVINO, President of California State University, Los  
Angeles, in his official capacity; THOMAS A. CROPPER, President of California State  
University Maritime Academy, in his official capacity; ADELA DE LA TORRE, President of  
San Diego State University, in her official capacity; GAYLE E. HUTCHINSON, President of  
California State University, Chico, in her official capacity; TOM JACKSON, JR., President of  
California Polytechnic State University, Humboldt, in his official capacity; SAÚL JIMÉNEZ-

SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN  
 N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN  
 MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D.  
 MORALES, President of California State University, San Bernardino, in his official capacity;  
 ROBERT S. NELSEN, President of California State University, Sacramento, in his official  
 capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her  
 official capacity; EDUARDO M. OCHOA, President of California State University, Monterey  
 Bay, in his official capacity; THOMAS A. PARHAM, President of California State University,  
 Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State  
 University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in  
 her official capacity; CATHY A. SANDEEN, President of California State University, East Bay,  
 in her official capacity; FRAMROZE VIRJEE, President of California State University,  
 Fullerton, in his official capacity; RICHARD YAO, President of California State University,  
 Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of California State  
 University, Bakersfield, in her official capacity – Plaintiff and Defendant together the “Parties” –  
 by and through their respective counsel, hereby stipulate and request, pursuant to FRCP Rule  
 41(a), that the Court order that all of Plaintiff’s claims against Defendants in this action be  
 dismissed with prejudice.

Date: October 5, 2023

REIN & CLEFTON

/s/ Aaron Clefton

By: AARON CLEFTON, Esq.

Attorney for Plaintiff

CHRISTINE DiBELLA

Date: October 5, 2023

CLYDE & CO US LLP

/s/ Alison K. Bealum

By ALISON K. BEANUM, Esq.

Attorney for Defendant

BOARD OF TRUSTEES OF THE

CALIFORNIA STATE UNIVERSITY

**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1, I hereby attest that on October 5, 2023, I, Aaron Clefton, attorney with Rein & Clefton, received the concurrence of Alison Beanum, Esq in the filing of this document.

/s/ Aaron Clefton  
Aaron Clefton

**PROPOSED] ORDER**

Pursuant to stipulation of the parties, and for good cause shown, all of the pending claims in this action are hereby dismissed with prejudice.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2023

\_\_\_\_\_  
Honorable Trina L. Thompson  
U.S. District Court Judge